

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

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| STONE ENERGY CORPORATION, ET AL | : | CIVIL ACTION NO. 6:18-CV-00213 |
| VERSUS | : | JUDGE MICHAEL J. JUNEAU |
| NIPPON STEEL & SUMITOMO METAL CORPORATION & PYRAMID TUBULAR PRODUCTS, LP, ET AL | : | MAGISTRATE JUDGE CAROL B. WHITEHURST |
| | : | JURY DEMAND |

**ANSWER OF NIPPON STEEL CORPORATION TO
THE CROSS-CLAIM OF SUMITOMO CORPORATION OF AMERICAS**

NOW INTO COURT, through undersigned counsel, comes Nippon Steel Corporation (hereinafter “NSC”), erroneously named as NSSMC, who, for answer to the Cross-Claim of Sumitomo Corporation of Americas (Doc. 62), avers as follows:

130.

No answer or response is required to the allegations of Paragraph 130 of the Cross-Claim. But if answer or response be deemed required, then those allegations are denied.

131.

The allegations of Paragraph 131 of the Cross-Claim are admitted.

132.

In response to the allegations of Paragraph 132 of the Cross-Claim, NSC likewise denies that the Tubing and Couplings had a redhibitory defect or vice as alleged by the plaintiffs. If there

was a purported redhibitory defect or vice in the Tubing and/or Couplings, as alleged by plaintiffs, NSC denies any such defect or vice would have existed at the time the Tubing and Couplings were delivered by NSC to Pyramid.

133.

The allegations of Paragraph 133 to the Cross-Claim are conclusions of law and for which no answer or response is required. But if answer or response be deemed required, then those allegations are denied.

134.

NSC denies cross-claimant's prayers for relief as well as all misnumbered and/or unnumbered paragraphs of the Cross-Claim.

135.

NSC expressly reserves the right to assert additional defenses and amend this answer to the extent additional facts are obtained in discovery and to the extent Sumitomo Corporation of Americas amends or clarifies any of its allegations in its Cross-Claim.

JURY DEMAND

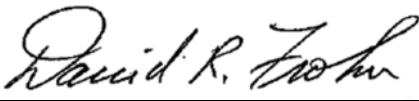
NSC specifically demands herein trial by jury as to all issues of fact raised by the Cross-Claim of Sumitomo Corporation of Americas, and the Answer of NSC, and all other issues triable by jury as a matter of law.

WHEREFORE, premises considered, NIPPON STEEL CORPORATION prays that its Answer to the Cross-Claim be deemed good and sufficient, and that after all due proceedings and legal delays are had, including trial by jury, there be judgment rendered herein in its favor and against cross-claimant, dismissing its claims against Nippon Steel Corporation with prejudice, and

at its costs, and for such other, further and different relief as justice and the equity of this case may require.

Respectfully submitted,

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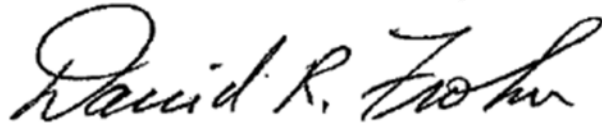
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**COUNSEL FOR NIPPON STEEL
CORPORATION**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record via U.S. Mail, postage prepaid and properly addressed, electronically, or via the Court's CM/ECF system, this 19th day of June, 2019.

A handwritten signature in black ink, reading "David R. Frohn". The signature is written in a cursive style with a large initial 'D' and 'F'.

DAVID R. FROHN